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Attorney(s): Roger A. McDonald,Esq.
Firm Name: ROGER A. MCDONALD, ESQ.
Address: 63 Washington Street
East Orange, N.J. 07017

Telephone No.: (973) 306-2750
Fax No.:
E-mail:
Attorney(s) for Defendant: ROGER A. MCDONALD, ESQ.

Midfirst Bank, et.als.

Plaintiff(s)

vs.

Alice Whitehgurst, et. al.

Defendant(s)

SUPERIOR COURT OF NEW JERSEY
PASSAIC COUNTY
CHANCERY DIVISION
DOCKET NO. F-12399-12

CIVIL ACTION

Appearance

9-7-12

TO: THE CLERK OF THE ABOVE-NAMED COURT.

PLEASE TAKE NOTICE that the undersigned hereby enters an appearance in the above-entitled action on behalf of the defendant Alice Whitehurst by way of Roger A. McDonald, Esq.

Dated: August 22, 2012

ROGER A. MCDONALD, ESQ.
Attorney(s) for Defendant.

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Attorney(s): Roger A. McDonald,Esq.
Law Firm: ROGER A. MCDONALD, ESQ.
Address: 63 Washington Street
East Orange, N.J. 07017

Telephone No.: (973) 306-2750
Fax No.:
E-mail:
Attorney(s) for:Alice Whitehurst,et.al., Defendant

Midfirst Bank,et als.

Plaintiff(s)

vs.

Alice Whitehurst,et.al.

Defendant(s)

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION DIVISION
PASSAIC COUNTY

DOCKET NO. F-12399-12

CIVIL ACTION

Certification in Lieu of Oath or Affidavit

I; Alice Whitehurst, the Defendant in the above entitled action do herewith Certify in Lieu of Oath or Affidavit object to the within Plaintiff'sOrder to Show Cause and Verified Complaint to Foreclosure upon the subject property at;14 La nark Avenue; Newark, N.J. for the following reasons.
1. Plaintiff's failed to serve upon the within Defendant(s) a proper Notice of Intention to foreclose prior to the filling of the original Verified Complaint to Foreclose.
2. The Plaintiff's calculation of the amount due to Plaintiff is incorrect.
(A)Based upon the Mortgage Assistance Program entered into by the within parties in 2010; Defendant - Borrower(s) payment balance due as of 03-08-2012 is $12,219.87(See true copy of within Defendant(s payment payment Summary Sheet attached hereto) .
)

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated:_____

Alice D Whitehurst
Signature

Alice D. Whitehurst
Type Name

Type Title

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Mortgage Assistance Program

	2009	2010	2011
$	289.00	$466.00	$903.27
$	289.00	$500.00	
$	289.00	$500.00	
$	289.00	$513.00	
$	289.00		
$	289.00		
$	289.00		
$	289.00		
$	289.00		
$	289.00		
$	289.00		
$	289.00		
$	3,468.00	$1,979.00	$903.27

Total Paid Out: $6,350.27

As of 03/08/2012 Midland requested Amount	$18,570.14
Minus amount paid	$6,350.27
Total Balance	$12,219.87

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ROGER A. MCDONALD, ESQ.
63 WASHINGTON STREET
EAST ORANGE, N.J. 07017
(973) 306-2750

August 22, 2012

Superior Court of New Jersey
ATTN: Clerk's Office; Foreclosure Processing Services,
Objection to Notice of Intention to Foreclosure.
P.O. Box 971
Trenton, N.J. 08625

RE: Midfirst Bank vs. Whitehurst, et al.
Docket No.: F-12399-12 {005829-11}

Your Honor:

Pursuant to receipt of the within Plaintiff's Order to Show Cause pleadings by the within Defendant(s) on August 11, 2012; enclosed herewith please find Defendant(s) Appearance together with Certification in Lieu of Oath or Affidavit in objection to Plaintiff's Notice of Intention to Foreclosure.
Kindly file on set of Originals and return a set back to this office marked filed in the envelope enclosed herewith.
Thank you in advance for your anticipated attention and consideration in this regard.

Respectfully Submitted,

Roger A. McDonald, Esq.

Cc: Hon. Margaret Mary McVeigh,P.J.Ch. - Passaic Vicinage
And Brian C. Nicholas, Esq.